

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

CARLO M. CROCE

Plaintiff,

vs.

SOTHEBY'S FINANCIAL SERVICES, INC., et  
al.

Defendants.

Case No. 2:23-cv-02896

Judge Morrison

Magistrate Judge Vascura

**JOINT MOTION OF PLAINTIFF AND DEFENDANTS FOR EXPEDITED RELIEF IN  
THE FORM OF A SHORT EXTENSION OF THE FACT-DISCOVERY DEADLINE  
TO COMPLETE DEPOSITIONS**

Plaintiff Carlo M. Croce and Defendants Sotheby's Inc., and Sotheby's Financial Services, Inc., by and through counsel, jointly move the court for expedited relief in the form of an extension of the fact-discovery deadline to March 31, 2025. Plaintiff and Defendants counsel have been working cooperatively and diligently to complete discovery by February 28, 2025 pursuant the Court's Order dated February 3, 2025 (ECF # 53). However, Plaintiff Croce has had recent head and lower back surgeries, and the time to full recovery may affect his ability to sit for a full day of deposition and respond completely to questions. The surgery and recovery have also delayed full production of responsive documents.

Given Plaintiff's ongoing recovery and the expected difficulty in sitting and responding to a full day of depositions, the parties jointly seek expedited relief in the form of an order extending the fact-discovery deadline, solely for the purposes of depositions. In this time, Defendants will take Plaintiff's deposition and Plaintiff will take a corporate deposition of each of the two defendants before March 31, 2025. The parties will have all other discovery completed by February 28, 2025.

/s/ Zachary C. Schaengold

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JUDGE